

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

IME WATCHDOG, INC.,

Plaintiff,

Civil Action No.:

1:22-cv-01032-PKC-JRC

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

-----X

SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

-----X

CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

-----X

MOTION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that upon the Declaration of Andreas Koutsoudakis, dated

April 16, 2025, the undersigned respectfully moves this Court, pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order granting leave to withdraw as counsel for Defendants/Third-Party Plaintiffs/Counter-Claimants/Counter-Defendants Safa Abdulrahim Gelardi, Vito Gelardi, and IME Companions LLC and for such other and further relief as to this Court seems just and proper.

Dated: New York, New York
April 16, 2025

DAVIDOFF HUTCHER & CITRON LLP

By: /s/ Andreas Koutsoudakis
Andreas Koutsoudakis, Esq.
Attorneys for Defendants
605 Third Avenue
New York, New York 10158
Tel.: (646) 428-3235
Fax: (212) 286-1884
Email: aak@dhclegal.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

IME WATCHDOG, INC.,

Plaintiff,

Civil Action No.:

1:22-cv-01032-PKC-JRC

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

-----X

SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

-----X

CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

-----X

DECLARATION IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

I, Andreas Koutsoudakis, an attorney duly admitted to practice before this Court, hereby declare

under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney and former member of the law firm of Iakovou and Xanthopoulos Law Group, PLLC f/k/a Koutsoudakis & Iakovou Law Group, PLLC (hereinafter “IX Legal”).

2. I was previously counsel of record for Defendants/Third-Party Plaintiffs/Counter-Claimants/Counter-Defendants Safa Abdulrahim Gelardi, Vito Gelardi, and IME Companions LLC (hereinafter the “Defendants”), in the above-captioned matter.

3. On June 8, 2022, Defendants/Third-Party Plaintiffs/Counter-Claimants/Counter-Defendants terminated IX Legal and retained Jonathon D. Warner of Warner & Scheurman to represent them in this action. See, “Letter Advising of Substitution of Attorney” filed on June 8, 2022 ([Docket No. 81](#)).

4. Furthermore, I am no longer a member of IX Legal.

5. Accordingly, I respectfully request leave to withdraw as counsel in this matter.

6. Defendants will continue to be represented by counsel from Warner & Scheurman, as Jonathan D. Warner has already entered a notice of appearance on behalf of Defendants and will remain as counsel of record in this case.

7. My withdrawal will not cause any prejudice or delay in this litigation, as Defendants will continue to be represented by counsel from a law firm who is already familiar with this matter.

WHEREFORE, I respectfully request that this Court enter an Order permitting me to withdraw as counsel for Defendants Safa Abdulrahim Gelardi, Vito Gelardi, and IME Companions LLC in the above-captioned matter.

Dated: New York, New York
April 16, 2025

DAVIDOFF HUTCHER & CITRON LLP

By: /s/ Andreas Koutsoudakis
Andreas Koutsoudakis, Esq.
Attorneys for Defendants
605 Third Avenue
New York, New York 10158
Tel.: (646) 428-3235
Fax: (212) 286-1884
Email: aak@dhclegal.com